



Next-Level Labor & Employment Lawyers

JESSICA L. MARRERO
Attorney
1100 Poydras St., Suite 1600
New Orleans, LA 70163
MAIN 504.524.4162
DIRECT 504.596.4137
FAX 504 596 4114
EMAIL JLM@kullmanlaw.com

January 26, 2024

Via ECF

Hon. Christian F. Hummel, U.S.M.J.
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

RE: *Yeend et al v. Akima Global Services LLC, 1:20-cv-01281-TJM-CFH*

Dear Judge Hummel:

I write on behalf of both parties who respectfully request an extension to the expert discovery and class certification deadlines to accommodate unforeseen scheduling difficulties.

To date, the parties have exchanged expert disclosures and have scheduled depositions of Plaintiffs' expert witnesses. However, due to an unforeseen scheduling issue, Defendant's rebuttal expert is unavailable for deposition until March 22, 2024. As a result, the parties respectfully request that the Court extend the expert discovery deadline to March 22, 2024 and extend the class certification deadline to April 5, 2024, in order to give the parties time to incorporate all necessary expert testimony into their motion papers.

Sincerely,

A handwritten signature in blue ink, appearing to read "JL".

Jessica L. Marrero

***Counsel for Defendant,
Akima Global Services LLC***

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